

## FEDERAL ELECTION COMMISSION WASHINGTON D.C. 20463

FEB 4 1998

Anthony N. Lepore Jr., Treasurer
Rhode Island Brotherhood of Correction
Officers
P.O. Box 8273
Cranston, RI 02911

Identification Number:

C00322362

Reference:

April Quarterly (1/1/97-3/31/97) and July Quarterly (4/1/97-6/30/97)

Reports

Dear Mr. Lepore:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule H4 discloses 100% non-federal activity. Please be advised that by definition, this activity does not qualify as a shared expense to be allocated between your federal and non-federal accounts. This activity should be itemized on a Schedule B for Line 21(b) of the Detailed Summary Page. Any reimbursement from your committee's non-federal account for any portion of this activity is not permissible and must be returned. Please amend your report to clarify this discrepancy.

-Schedule H4 discloses a disbursement(s) which is categorized as a fundraising expense(s); however, a Schedule H2 has not been filed to disclose the allocation ratio. All committees are required to allocate the direct costs of each fundraising event in which the committee collects both federal and non-federal funds. The costs are allocated according to the funds received ratio and reported on Schedule H2. 11 CFR §§106.5(f) and 106.6(d). Please file a Schedule H2 to disclose the ratio for the fundraising event(s).

- -Please provide a Schedule A to support the entry disclosed on Line 11(c) of the Detailed Summary Page. All contributions from political committees must be itemized on Schedule A <u>regardless of the amount</u>. 2 U.S.C. §434(b)(3)(B)
- -Please amend your report by providing the purpose, full vendor name and address, and date for each disbursement itemized on Schedule B or H4 supporting Line 21(b).
- -Please provide the total(s) for Line 21(c), Columns A and B of the Detailed Summary Page. Note that changes in your figures may affect your Column B totals on this report and/or on subsequent reports.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Melissa Hurd

Reports Analyst

Reports Analysis Division

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